

1 LAURA VARTAIN HORN (SBN: 258485)

2 laura.vartain@kirkland.com

3 **KIRKLAND & ELLIS LLP**

4 555 California Street, 30th Floor

San Francisco, CA 94104

Telephone: (415) 439-1625

5 ALLISON M. BROWN (*Pro Hac Vice* admitted)

6 allison.brown@kirkland.com

7 2005 Market Street, Suite 1000

Philadelphia, PA 19103

Telephone: (215) 268-5000

8 alli.brown@kirkland.com

9 JESSICA DAVIDSON (*Pro Hac Vice* admitted)

10 jessica.davidson@kirkland.com

11 601 Lexington Avenue

New York, NY 10022

Telephone: (212) 446-4723

12 *Counsel for Defendants*

13 UBER TECHNOLOGIES, INC.,

14 RASIER, LLC, and RASIER-CA, LLC

*[Additional Counsel Listed on Following Pages]*

15  
16 **UNITED STATES DISTRICT COURT**

17 **NORTHERN DISTRICT OF CALIFORNIA**

18 **SAN FRANCISCO DIVISION**

19  
20 IN RE: UBER TECHNOLOGIES, INC.,

PASSENGER SEXUAL ASSAULT

21 LITIGATION,

22  
23 This Document Relates to:

24 *Jaylynn Dean v. Uber Technologies, Inc., et*

*al.*, No. 3:23-cv-06708

Case No. 3:23-md-03084-CRB

25  
26 **DECLARATION OF MARIANA  
ESTEVES IN SUPPORT OF  
DEFENDANTS' MOTION FOR  
PARTIAL SUMMARY JUDGMENT**

Judge: Hon. Charles R. Breyer

Courtroom: Courtroom 6 – 17th Floor

1 SABRINA H. STRONG (SBN: 200292)

2 sstrong@omm.com

3 JONATHAN SCHNELLER (SBN: 291288)

4 jschneller@omm.com

5 **O'MELVENY & MYERS LLP**

6 400 South Hope Street, 19th Floor

7 Los Angeles, CA 90071

8 Telephone: (213) 430-6000

9 Facsimile: (213) 430-6407

10 PATRICK L. OOT, JR. (*Pro Hac Vice* admitted)

11 oot@shb.com

12 **SHOOK, HARDY & BACON, LLP**

13 1800 K Street NW, 10th Floor

14 Washington, DC 20006

15 Telephone: (202) 783-8400

16 Facsimile: (202) 783-4211

17 ALYCIA A. DEGEN (SBN: 211350)

18 adegan@shb.com

19 MICHAEL B. SHORTNACY (SBN: 277035)

20 mshortnacy@shb.com

21 2121 Avenue of the Stars, Suite 1400

22 Los Angeles, CA 90067

23 Telephone: (424) 285-8330

24 Facsimile: (424) 204-9093

25 CHRISTOPHER V. COTTON (*Pro Hac Vice* admitted)

26 ccotton@shb.com

27 255 Grand Boulevard

28 Kansas City, MO 64108

Telephone: (816) 474-6550

Facsimile: (816) 421-5547

**DECLARATION OF MARIANA ESTEVES**

I, Mariana Esteves, declare as follows:

1. I am over the age of 18 years and a citizen and resident of Brazil. I have personal knowledge of the facts set forth herein, except as to those stated on information and belief and, as to those, I am informed and believe them to be true. If called as a witness, I could and would competently testify to the matters stated herein. I submit this declaration in support of Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC's (collectively, "Uber") Motion for Partial Summary Judgment.

2. I am currently employed by Uber Technologies, Inc. as a Group Product Manager of Safety Features. I have been employed by Uber from 2019 to the present. My roles during that time have included Lead Project Manager of Safety Features and Safety Project Manager of Safety Features.

3. The Uber App provides a suite of real-time, responsive safety features that Uber continuously enhances over time.

4. As part of every trip, Uber collects and stores GPS data, which it uses in internal investigations of misconduct allegations and to assist law enforcement with related criminal investigations.

5. In September 2019, Uber released a safety feature called "RideCheck," which analyzes GPS data in real time to detect unexpectedly long stops and possible car crashes. If such a stop is detected, the Uber App proactively reaches out to the rider and the driver to confirm that neither has any concerns about the trip.

6. In 2020, Uber enhanced the "RideCheck" real-time detection technology to include detection of trips that end prior to arrival at the rider's requested destination (mid-way dropoffs). In 2021, Uber added detection of unexpected route deviations. The vast majority of the time that RideCheck is triggered, there is no associated safety incident.

7. In 2021, Uber released In-App Audio Recording, a safety technology which allows a rider or driver to record audio during a trip and send the audio directly to Uber so the company

1 can review and take any appropriate action.

2 8. In September 2023, a competing rideshare platform, Lyft, offered a Gender Match  
3 feature (“Women+ Connect”) in certain markets.

4 9. Uber has been exploring the possibility of allowing women riders to set a  
5 preference to be matched with women drivers, and vice versa. In July 2025, Uber launched a pilot  
6 of its Women Preferences Option in San Francisco, Los Angeles, and Detroit to test and optimize  
7 the feature.

8 10. Uber does not ordinarily collect gender information from riders when they create  
9 an account.

10 11. Offering a Gender Match feature that would permit female riders the option of  
11 matching exclusively with female drivers (“Gender Match”) requires the implementation of a  
12 machine learning algorithm (a “Gender Inference Framework”) designed to infer the gender of  
13 riders and drivers using names and other information.

14 12. Any Gender Match feature also depends on Uber’s verification services to ensure  
15 drivers or riders do not misrepresent their gender to gain access to the program.

16 13. Implementing a Gender Match feature also raises other serious challenges, such as  
17 complex issues related to the spectrum of gender identities, including how to account for  
18 transgender or non-binary individuals, and risks relating to allegations of discrimination.

1 I declare under penalty of perjury under the laws of the United States of America that the  
2 foregoing is true and correct. Executed on the 10th of November, 2025.

3  
4  
5 Mariana Esteves

6 MARIANNA ESTEVES  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28